

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

**In re China North East Petroleum Holdings
Limited Securities Litigation**

No. 10-CV-04577 MGC

**THIS DOCUMENT RELATES TO:
ALL ACTIONS**

**NOTICE OF PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF
SETTLEMENT AND CERTIFICATION OF SETTLEMENT CLASS**

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Lead Counsel for the Class

PLEASE TAKE NOTICE that Lead Plaintiff Acticon A.G. ("Lead Plaintiff") individually and on behalf of itself and all others similarly situated will and hereby does move this Court on a date and at such time as may be designated by the Honorable Miriam Goldman Cedarbaum, Courtroom 14A, United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York 10007-1312 for an order: (i) granting Preliminary Approval of the Proposed Settlement (the "Settlement"); (ii) granting certification of the Settlement Class; (iii) granting approval of the Notice to the Settlement Class and conditional Settlement Class certification; and (iv) setting a date for a Settlement Hearing and deadlines for

the mailing of the Notice, the filing of Settlement Class Member objections, the filing of opt-out notices, and the filing of Lead Counsel's application for attorneys' fees and expenses.

This motion is based on this Notice of Motion, the accompanying Memorandum of Law in support thereof, the Stipulation of Settlement (the "Stipulation"), filed simultaneously herewith, the exhibits thereto, the pleadings and records on file in this action, and other such matters and argument as the Court may consider at the hearing on this motion. The Settling Defendants, as defined in the Stipulation, do not oppose this motion.

Dated: August 19, 2013

Respectfully submitted,

**POMERANTZ GROSSMAN HUFFORD
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